

tortiously interfered with Wagner's contractual relationships and business expectancies. If allowed to continue, Defendants' conduct will continue to cause irreparable harm to Wagner for which it has no adequate remedy at law.

3. The balance of harms and public interest favor granting the injunctive relief requested herein.

4. This motion is supported by Plaintiff's accompanying Memorandum of law and the Declarations of Laurie Crocetti and David Sinclair, which are to be filed in support of this Motion.

WHEREFORE, Plaintiff respectfully requests that this Court enter a temporary restraining order and preliminary injunction against Defendants Vidon and GSG, and anyone acting in concert with them:

A. Enjoining them from making any further false or misleading statements, and from using any words, terms, names, symbols, or devices, tending to cause confusion as to the affiliation or association of Vidon or Vidon's trim products with Wagner or Wagner's Jewelite® Trim, including without limitation any statements stating or implying that Vidon's trim products are the "Original" trim products, that Vidon's trim is "formerly Jewelite," that Vidon is a "new name" or a "new name" for the "same product," or that Vidon's trim products are the "industry standard" or have been in production for "30+ years" or any period before early 2021;

B. Enjoining them from using in any manner Vidon's current product packaging for its sign trim products or any product packaging that is the same or confusingly similar to Wagner's;

C. Enjoining Vidon from competing with Wagner's Jewelite® Trim products or selling sign trim products to any of Wagner's customers;

D. Enjoining Vidon from interfering with Wagner's contractual or business relationships with customers;

E. Enjoining Defendants from engaging in any further acts of unfair competition, misrepresentation, or deception or otherwise competing with Plaintiff through unfair, deceptive, or other wrongful means; and

F. Granting such additional relief as this Court deems appropriate.

Dated: April 22, 2021

Respectfully submitted,

/s/ Bradley P. Nelson
One of the attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

Bradley P. Nelson, an attorney, certifies that he caused a copy of the foregoing Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction to be served by email on the following on this 22nd day of April 2021:

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